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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;  
and ORACLE INTERNATIONAL  
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC. , a Nevada corporation;  
SETH RAVIN, an individual,

Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DEFENDANT RIMINI STREET  
INC.'S MOTION FOR LEAVE TO  
FILE UNDER SEAL EXHIBITS C-H  
AND J TO THE DECLARATION OF  
RYAN D. DYKAL (DKT 499)**

**RIMINI STREET'S MOTION TO SEAL**

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010 (*See* Dkt. 55, "Protective Order"), Local Rule 10-5(b) and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Defendant Rimini Street, Inc. ("Rimini") respectfully requests that the Court grant leave to file under seal Exhibits C-H and J to

1 the Declaration of Ryan D. Dykal. A public, redacted version of Mr. Dykal's Declaration with all  
2 Exhibits was filed on September 18, 2014. (*See* Dkt. 499). Additionally, also on September 18, 2014,  
3 the unredacted version of Declaration Exhibits C-H and J were filed under seal. (*See* Dkt. 500).

4           The Protective Order provides that: "Counsel for any Designating Party may  
5 designate any Discovery Material as "Confidential Information" and as "Highly Confidential  
6 Information- Attorneys' Eyes Only" under the terms of the Protective Order only if such counsel in  
7 good faith believes that such Discovery Material contains such information and is subject to  
8 protection under Federal Rule of Civil Procedure 26(c). The designation by any Designating Party of  
9 any Discovery Material as "Confidential Information" or "Highly Confidential Information-  
10 Attorneys' Eyes Only" shall constitute a representation that an attorney for the Designating Party  
11 reasonably believes there is a valid basis for such designation". Protective Order at Paragraph 2.

12           A description of all Exhibits referenced in this Motion is included below:

- 13           1. Exhibits C and D: These exhibits consist of excerpts from the Expert Report of  
14           Elizabeth Dean, which has been designated "Highly Confidential Information-  
15           Attorneys' Eyes Only" by Oracle.
- 16           2. Exhibits E-H: These exhibits consist of excerpts from the Expert Report of Scott  
17           Hampton, which has been designated "Highly Confidential Information-  
18           Attorneys' Eyes Only" by Rimini.
- 19           3. Exhibit J: This exhibit is a CedarCrestone Declaration that was produced in the  
20           present case and designated "Confidential Information" by Oracle.

21           Thus, in identifying the Declaration Exhibits which contain Confidential or Highly  
22 Confidential material, Rimini, contends that good cause exists for sealing those particular Exhibits.

23           For the foregoing reasons, Rimini respectfully requests that the Court grant leave to  
24 file Exhibits C-H and J under seal.

1 DATED: September 18, 2014

SHOOK, HARDY & BACON

2  
3 By: /s/ Robert H. Reckers

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of September, 2014, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, District of Nevada, using the electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

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